

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

MAR 25 2008

**MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT**

Mapquest, Inc.,)
Plaintiff,)
v.) Civil Action No.
CIVIX-DDI, LLC,)
Defendant.)

)

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. §1446, the defendant CIVIX-DDI, LLC (“CJVIX”) hereby removes to this Court the state court action described below.

In support of its petition, CIVIX states the following:

1. On December 11, 2007, an action was commenced in the Circuit Court of Cook County, Illinois, County Department, Law Division, entitled Mapquest, Inc., Plaintiff, v. CIVIX-DDI, LLC, Defendant, Case Number 2007 L 13843.

2. CIVIX was served with summons and received a copy of Mapquest's petition on February 25, 2008. Therefore, this Notice is timely.

3. A copy of all process, pleadings and orders served upon CIVIX in the state court action are attached hereto as Exhibits 1 (Complaint and Exhibits) and 2 (Order).

4. This action is a civil action of which this Court has original jurisdiction under 28 U.S.C. §1332, and is one which may be removed to this Court by CIVIX pursuant to the provisions of 28

U.S.C. §1441(b) in that it is a civil action between citizens of different states and the matter in controversy exceeds the sum of \$75,000, exclusive of interests and costs.

5. Mapquest is a corporation organized under the laws of the State of Delaware.

6. Mapquest's executive headquarters are located at 3710 Hempland Drive, Mountville, Pennsylvania, 17554. Mapquest's corporate officers including its President (Michael Mulligan), Vice President (William Muncster) and Secretary/Treasurer (James W. Thomas) are located at 3710 Hempland Drive, Mountville, Pennsylvania, 17554. Therefore, according to the "nerve center" test of the Seventh Circuit, Mapquest has its principal place of business in Pennsylvania.

7. In its complaint, Mapquest has demanded relief in excess of \$75,000, exclusive of interest and costs (see Ex. 1, Complaint at pp. 8, 10).

8. CIVIX is a limited liability company organized under the laws of the State of Colorado.

9. At all times since the filing of this action by Mapquest, CIVIX has had its principal place of business in Virginia.

10. There is complete diversity between Mapquest and CIVIX.

WHEREFORE CIVIX prays that this action be removed to the United States District Court for the Northern District of Illinois.

Respectfully submitted,



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Attorneys for Defendant, CIVIX-DDI, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **NOTICE OF REMOVAL** was served upon the following parties on March 25, 2008 by hand delivery:

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Henry P. Casin

SEALED DOCUMENT

NOT AVAILABLE

FOR PUBLIC VIEWING